

USEPA/OECA/OC
State and Tribal Assistance Grant (STAG) 2000-2001
South Carolina: Measuring the Effectiveness of On-site Inspection
with Non-regulatory Follow-up by Industry Sectors
Quarter 1, FY2003
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**Quarterly Reporting Form for EPA's 2000 and 2001
Enforcement and Compliance Assurance Grants**

Reporting Period: Year: FY2003
☒ Oct-Dec (due last working day Jan)
☐ Jan-Mar (due last working day Apr)
☐ Apr-Jun (due last working day Jul)
☐ Jul-Sep (due last working day Oct)

I. Information

State and Department: South Carolina, Industrial Ecology Program, University of South Carolina School of the Environment

Title of Project: Compliance Assistance-Measurement of Effectiveness of On-site Inspections with Non-Regulatory Follow-up by Industrial Sectors

Grant Contact Person:

LeAnn Herren, Director
Industrial Ecology Program
School of the Environment, University of South Carolina
Columbia, South Carolina 29208
Phone: 803/777-9061
Fax: 803/777-5715
E-mail: herren@environ.sc.edu

Funds Received by State (Date and amount): 09/18/01 amount \$74,729

EPA Regional Project Officer: Gloria Love

Author of report: LeAnn Herren

II. Status of Project Milestones

Each milestone for the entire project should be entered into this table at the beginning of the grant period and should appear in every quarterly report (unless it is dropped from the project). With each quarterly report fill in dates or add milestones as appropriate. If dates or milestones are adjusted in subsequent reports, please indicate this in the comment field or in text below the table.

(Expand table as appropriate.)

Project Milestones	Anticipated Completion Date	Completion Date

GIS Mapping of past compliance inspections & Updates as necessary	December 2001	December 2001
Website Development	January 2003	
Website Upload and Announcement	January 2003	
Compliance Assistance Re-Inspections	December 2002	December 2002
Community Outreach Meetings as Requested	January 2003	
Community Information Access	October 2002	October 2002
Technical Assistance to Additional Sectors	December 2002	December 2002

III. Status of Project Completion.

Anticipated project completion date: March 2003

If this anticipated date is later than the date reported on the last report, please explain.

January 2002

This completion date is later than originally proposed due to delays with our state agency partner, the South Carolina Department of Health and Environmental Control (SCDHEC) and the community partner, the Community Action Group (CAG). The CAG has been the designated community leader in the Charleston Community Based Environmental Project. Over the last six to eight months, the CAG has taken on a new director, fired the new director, attempted to re-organize and voted on becoming a sub-group of the local empowerment zone. At this time, the CAG is on hiatus and the decision has been made by the principal investigator of this grant to approach the communities directly through previous contacts established in the former CAG.

April 2002

The CAG did not meet in the first quarter of 2002. Meetings have been proposed for the second quarter (specifically in May 2002). Should the CAG again delay, alternative meetings have been proposed directly with community leaders during late second quarter and early third. The CAG continues to experience leadership problems.

July 2002

The CAG has once again postponed meeting. At this point, the decision has been made to work directly with the community leaders. An updated contact list is to be prepared beginning in late summer and direct contact with the community regarding project education in early fall. During the initial contact, a schedule of community meeting dates will be requested in order to set up a training session. While the principal investigator of the grant understands the importance of the overarching community group (CAG) and will therefore continue to attempt to work with the group, at this time it does not appear that the grant could be successful if this was the primary access to the neighborhoods. This decision should in no way been seen as a direct reflection on

the importance of the CAG in the Charleston Community Base Environmental Project.

October 2002

The CAG as a separate entity no longer exists in the Charleston Community Based Environmental Project. Lack of support from the neighborhoods for the continuation of the community has been blamed for the downfall of the group. Alternative groups have been formed through the local economic development group that will hopefully take on the role of environmental advocates for the communities as a whole. However, neighborhoods are now focusing more attention on their individual environmental concerns and are strengthening their efforts to work through the community groups. It is these neighborhood associations that have become the focus of the environmental outreach efforts of the project partners. It is through these groups that education on the availability of compliance assistance will be made known to the community. Current officer lists for the neighborhood associations have been prepared by Trident staff members assigned to the Community Based Environmental Project. As materials are completed for the website, informational mailings will be forwarded to the officers.

Additionally, these officers will be encouraged to request the presence of project staff to provide training and/or an overview of the website and various other compliance assistance information.

As funding for this effort winds down, the daily presence of project staff in the neighborhood will dwindle. It will fall to the neighborhoods to encourage businesses to continue their environmental efforts and to monitor the environmental status of the community. SCDHEC will rely on the community to contact them with suspected small business violations.

January 2003

An organized group of the neighborhood association representatives meeting to discuss only environmental issues no longer exists within the North Charleston area. An economic development group with a small environmental workgroup is now the only active joint program in the area and the environmental group does not appear to be significantly active. The neighborhoods have returned to the practice of facing environmental issues as they occur within the communities as individual entities. Although the neighborhood associations were contacted about the availability of training on using the internet to address community environmental concerns, little interest was expressed in sessions during the forth quarter. The associations did request continued information on websites, trainings, etc. and indicated the information would be forwarded to association members in the appropriate manner be it meetings, mailing or posting of websites at the community centers. It appears that the website and telephone will now become the primary community tools between the community and the non-regulatory assistance programs regarding environmental issues in the neighborhoods. Small businesses will be provide information on environmental regulations and compliance assistance through e-mail questions and telephone calls to both the Industrial Ecology Program and SCDHEC Trident District Office. If at all possible, any community that does request environmental training once the project ends will still be offered the opportunities. It appears to most "by-standers" that interest in the environment is at an extreme low within the neighborhoods at this time. This should in no way indicate that the North Charleston communities are not concerned about the environment, just that economic, health and national issues have currently taken the center stage in low income areas.

January 2002

While the initial mapping has been completed and the website is in draft form at this time, a delay occurred within the state agency in securing staff to lead the compliance assistance re-inspections. State law requires, that only personnel employed at SCDHEC can complete environmental regulatory inspections. A SCDHEC inspector began the initial round of re-inspections, along with adding compliance assistance for new sectors, in February 2002. The Industrial Ecology Program will provide technical assistance in meeting compliance standards and exceeding standards through pollution prevention throughout the inspections process. Recent meetings with SCDHEC indicate the inspection and re-inspection process will continue through the summer. This will delay both the update of the GIS mapping and the end of the referral process to sometime in the fall.

April 2002

SCDHEC made the decision to begin inspections of a new sector at the same time as beginning the re-inspections process. The first new sector chosen was auto salvage and junkyard. These shops have been a major regulatory problem and eye soar to the neighborhoods in question. Between late February and the end of March, four facilities were inspected. Three facilities were found to be in compliance with state environmental laws, but were advised as to the advantages of a pollution prevention/waste minimization assessment. Follow-up contact by the Industrial Ecology Program with the in-compliance companies will take place in the second quarter of 2002. The fourth facility was found to be out of compliance and as was referred to the Industrial Ecology Program for compliance assistance. Ten violations were found ranging from pressure washing of engines into storm drains to oil spills to missing spill prevention plans. Five additional best management practices were recommended to improve the basic “housekeeping” of the site. The 45-day clock for correcting violations using compliance assistance was started March 25. Contact was made with the Industrial Ecology Program for a site visit to assist, with the visit taking place early in the second quarter (information to follow in next quarter reporting). Copies of the site inspection sheets will be included in the final report.

The re-inspections of sites from the first round of joint SCDHEC and Industrial Ecology compliance assistance began during the month of March. During the 30 days, six sites were fully inspected by the regulatory program of SCDHEC. All six facilities were found to have taken advantage of the assistance provided in the last round of inspections and maintained their in-compliance status. Although it is only preliminary, early signs indicate that when small businesses are provided information in conjunction with compliance assistance, they will take advantage of the opportunity provided to make environmental improvements. The hypothesis goes on to state that small businesses given assistance as opposed to enforcement will make a commitment to uphold the new business practices implemented during the compliance assistance phase. This again, although in the early stages, appears to be holding true.

July 2002

Inspections have now begun in the new sector of auto salvage yards, an offshoot of the auto repairs and maintenance facilities from the first phase. While the original plan of SCDHEC and the Industrial Ecology Program was to select an additional service sector such as dry cleaning or printing, this sector was chosen at the request of the neighborhoods within the environmental justice area. The residents saw auto salvage yards as being a nuisance and a potential site for

environmental violations. SCDHEC and Industrial Ecology met and agreed that the compliance assistance program was designed to be a partnership with the neighborhoods within the environmental justice area in North Charleston and therefore the residents should have the final say in the direction of the project. With that philosophy in mind, ten salvage yards located in the area have been inspected with six of the sites found to have a total of forty-four violations. The violations ranged from not having storm water permits or spill prevention plans, to improper storage of parts and incorrect disposal of automotive fluids. The facilities were referred to the Industrial Ecology Program for assistance as needed. The majority of the violations have been corrected, with only final approval of permits and plans remaining.

In addition, at the request of the neighborhood, two City of North Charleston automotive storage and maintenance facilities were inspected following the guidelines established for small businesses within the region. Both facilities were found to be out of compliance with a total of fourteen violations between them. The violations were similar to that of the auto salvage yard with missing permits and plans, improper storage and incorrect disposal. The City was provided assistance by the Industrial Ecology Program and is currently working towards compliance.

SCDHEC and Industrial Ecology will continue to expand the sectors for the compliance inspection and assistance process at the neighborhood request, as long as funding exists to complete such efforts. While this will extend the “completion date” of the technical assistance to additional sectors for the Industrial Ecology Program, it will provide value to the community and is seen as a worthwhile investment of time and experience.

The re-inspection efforts for the auto body repair and maintenance shops continued during the second quarter. As will be covered further in the results section, over half of the facilities have now been reviewed with the majority (approximately 90%) remaining in compliance following the compliance assistance efforts in previous phase of the project.

October 2002

At the first of July, the SCDHEC compliance assistance inspector took a new position with the agency. He began the director of the local Shellfish Program. With this change in staff, no inspections took place in July or August. Prior to leaving the position, follow-up inspections were completed for any out-of-compliance small businesses found during the second quarter of the project. The majority of facilities (over 90%) had finished the required changes and were operating in compliance. One notable exception with the City of North Charleston which is still working to meet the requirements presented under the last inspection.

In mid-August, a new inspector was assigned to the program to take over the re-inspections and the new sector inspections. After a training period with the compliance assistance project supervisor, the inspections restarted in September. During the month of September, twenty-four sites were reviewed. Of the sites inspected, fourteen were found to be out of compliance with state regulations. Several companies contacted the Industrial Ecology program for assistance on what turned out to be minor infractions such as litter, general housekeeping and unclear or smeared labels on used oil drums. Four of the facilities inspected are suspected of dumping used oil, fuel and fluids from automobiles into the city storm water sewers. Follow-up with the businesses and the city water treatment plant is ongoing. The final inspections should take place

within the next thirty days. This will allow re-inspection of any out of compliance facilities, including the forty-five day period for self-improvement, prior to the completion of the project in March 2003.

January 2003

The problem with the inspector recording minor infractions involving general housekeeping discussed in the previous quarterly report have not been addressed. All violations involving litter and general housekeeping not officially recognized as regulatory violations have been removed from the compliance assistance letters. The letters with only these infractions under debate in the last quarterly report will be removed from the out-of-compliance column during compliance data calculations for the final report.

A push was made during the fourth quarter to complete the re-inspections of the small businesses identified during the first phase of the compliance assistance project. Final inspections were also done on the last auto salvage yards, the new sector added to the compliance assistance project at the request of the neighborhood associations. The final re-inspection took place on January 2, 2003, however this last inspection will be included in any data calculations made for the fourth quarter. Eighteen inspections were completed, with sixteen of the companies found to be in compliance. Of the two out-of-compliance companies, one was from the original group and one was from the new auto salvage sector. Review of the company from the original group found the business had been sold and the new owners not involved with the compliance assistance efforts. When provided information on the infractions, both of which were minor – unclear labeling of used oil and an unsealed used oil – the new owners made corrections within days of the inspection. A drive-by of the location a month later indicated that the new procedures were still being followed. The out-of-compliance company from the auto salvage sector required only basic educational assistance on the proper storage and disposal of used oil, antifreeze and small amounts of oil in dirt. While the antifreeze issue was the most serious violation, the improper disposal was accidental due to storage of old radiators outside that were not fully drained during a rain event. Once informed of the problem, the business quickly made changes and was in compliance before the 45 day re-inspection window. The owner indicated that now that he knew the problem, he would make sure it never happened again.

January 2002

In addition, the community portion of the project is also experiencing delays. The community outreach meetings and the community information access were to focus on learning about the compliance assistance project in North Charleston and learning to use the internet as a tool to help improve environmental conditions in the environmental justice zone. The community centers were to be provided a computer with internet access through a grant from EPA Region IV to SCDHEC. The community residents were to be taught by the Industrial Ecology Program how to access the website developed under this grant and use this site to contact SCDHEC and other state environmental assistance programs. Links on this site would also provide residents with a means of learning environmental risks and health protection options. Delays were experienced by SCDHEC in implementing computer purchase grant. A recent meeting indicated that bids were about to be released and computers should be in the community centers and operational by summer. The community outreach meeting would begin immediately following the computer set-up by SCDHEC.

April 2002

During the first quarter, bids were prepared but not released. The new estimated time for computer purchase is late in the second quarter of 2002. As mentioned, this will delay the community-training portion of the grant until at third quarter of 2002. Within the Industrial Ecology Program, the position for website development was re-posted in February, with the position offered in late March. An experienced computer network manager recently retired from the university and returning as a part-time assistant, should complete site development during the second quarter of 2002. A site link will be provided with the appropriate quarterly report.

July 2002

The website for the environmental measurement project continues to be in development. The new timeline allows for upload of the page, following server upgrades, late in the third quarter of the project. Along with the expected maps and results, a decision has been made to include a downloadable version of the inspection guidelines being used by SCDHEC to review the small businesses in the environmental justice zone. This will allow businesses on the “fringe” of the area to self inspect in preparation for the possible expansion of the compliance assistance efforts in future budget cycles. While delays are ongoing for the purchase of computers by the state, a review of the community centers has found that the majority purchased at least one computer on their own. This purchase will allow the education portion of the project to continue regardless of future delays in the matching state grant for computer upgrades.

October 2002

A retired university network manager has been hired to complete the website for the small business compliance assistance project. The staff member is currently reviewing the materials selected for the website to determine which materials can be loaded on the page and which should be available only in PDF form for downloading. The goal of this review is to assure that the website will load quickly on any public computer, many of which do not have large hard drives for graphics heavy websites. Maps from the original project are being reviewed for accuracy in business locations. In addition, the new segments provided compliance assistance in this grant period are to be added to the original maps. At this time, discussion is ongoing regarding how sites should be distinguished based on which project the assistance falls under. The funds from EPA for SCDHEC to purchase computers for the community centers have still not become available. At this point, it is the opinion of all parties involved that the funds will not reach the area in time to be applicable to this grant project. While this has been viewed by some in the neighborhood as a lack of support of the community centers, it has not seemed to significantly impact the relationship between members of this project with the community. The efforts to provide the community with education on the availability of environmental assistance through the website will continue. Contact has been made with the local school districts and other educational venues on interest in training on the use of the website. At this point, no trainings have been scheduled in the schools. Information on the website and use of the website will be placed in a memo and provided to the school upon the upload of the website. Efforts will continue to be made during the forth quarter to schedule trainings and/or informational presentations at the local community centers on the availability of environmental assistance and the opportunity for the community to become involved in the protection of their local environment.

January 2003

The opportunity to link the compliance measurement program to the computer purchase program for community centers is no longer feasible within the timeline of the project. Funds have yet to be received by SCDHEC to purchase the computers. In addition, personnel changes to the project have removed the original staff working towards the computer purchase from the environmental justice project. The new staff has not indicated a willingness to continue “chasing its tail” on a project they feel will not be funded. While this is a disappointment to the original project staff, it appears the community centers are not surprised by this development. Most centers have moved forward with their own computer purchase programs. Again, the inability to purchase the computers has not had a negative impact on the relationship between project partners and community centers. All centers have agreed to provide information developed by the project to the neighborhood residents by whatever means available. As discussed previously, no community center requested onsite training in usage of the website during the fourth quarter of 2002. However, this does not indicate a lack of interest in the environment but rather conflicting priorities on the schedules during the busy fall holiday season by neighborhood associations and community centers.

The website for the project has been developed and will be uploaded at the first of the year to coincide with the end of the direct onsite assistance portion of the measurement project. Small businesses within the project area have been provided with information on accessing environmental information through the website beginning in 2003. As the website will become the primary communication tool between the community businesses and the non-regulatory programs, steps have been taken to expand the original site services. In addition to community environmental information, the site now includes compliance assistance worksheets and related reports. A link has been provided to two services within the Industrial Ecology Program to provide continued direct assistance to the small businesses, the Waste Market Development Program and the Business Recycling Assistance Program. The Waste Market Development Program is a voluntary program that allows companies to look for alternatives to disposal of waste products. The companies provide IEP staff with information and samples of waste products. The IEP staff then works to find “takers” for the waste, sometimes only finding a company a free place to recycle the wastes or in the best scenario finding a purchaser for the materials. The official catch phrase of the program has been “one businesses trash is another businesses treasure”. This program has funding to continue throughout the 2003 calendar and will be made available to all companies accessing the measurement website. The Business Recycling Assistance Program is a partnership between several non-regulatory groups within the state to provide an online waste exchange and recycling opportunity training. Businesses within the project area have been placed on the mailing list for upcoming educational opportunities on small business recycling and environmental management. In addition, a link on the website will access the BRAP waste exchange allowing companies to both post their wastes and lower costs by receiving non-virgin materials from nearby businesses. This is one proactive way in which IEP hopes to continue the success of the compliance assistance work within the community.

January 2002

It should be noted that these delays indicate a no-cost extension will have to be filed by the Industrial Ecology Program. Effective in January of 2002, spending from the Measurement

Grant by the Industrial Ecology Program was put on hold to reserve funds for later operations. Little, if any, funds are expected to be spent during the period of January – May 2002. Projected spending during this period will include final website development and upload expenses, potential travel to organizational meetings with community and SCDHEC, and purchase of supplies for community outreach meetings but minimal staff time, as this will be reserved for the on-site assistance and community outreach trainings from June – December 2002.

April 2002

As predicted, no funds were spent from the Measurement Grant during the first quarter of 2002. Compliance assistance, information development and planning taking place during this period were not charged to the grant in an effort to reserve funds for the upcoming onsite work. The request for a no cost extension has been approved internally and will be submitted to the Environmental Protection Agency during the second quarter of 2002. While this delay is disappointing, the initial signs of success with the small businesses prove the project will be worth the effort. Spending during the second quarter will also be kept to a minimum to reserve funds for the onsite assessments and trainings.

July 2002

During the second quarter of 2002, no personnel expenses were charged to the Measurement Grant. Assistance was provided to small businesses through telephone and internet contact as opposed to site visits. This limited spending will allow the project to have more direct assistance to the communities during the educational phase. It does not appear that this offsite work has been detrimental to the businesses, as most requests have involved permitting questions and waste disposal contractors. This does however indicate that for future efforts with the community, a toll-free assistance line would be beneficial. A no cost extension for the Measurement Grant was requested in early June and initial reports indicate it has been granted.

October 2002

During the third quarter of 2002, work hours were again charged to the Measurement grant. The no cost extension of the grant was filed with the grants and contracts office of the university July 30, 2002. The new end date for the grant is March 1, 2003. At this time, no additional funds have been discovered that would allow the project to continue for the small business community. Several proposals and pre-proposals have been filed with EPA and other agencies, but none have been selected for funding. Due to the upcoming budget cuts, it is unlikely the state will be able to fully support a new position in compliance assistance in the Trident District or to expand the program into other Districts. The Industrial Ecology program will continue to provide technical assistance to the small businesses in the environmental justice area as long as feasibly possible following the end date of the grant.

January 2003

During the fourth quarter of 2002, work hours were charged against the Measurement grant as it entered its final five months. The end date of the grant will be March 1, 2003. As stated last quarter, no funds have been found to continue the partnership between the SCDHEC Trident District Office and the Industrial Ecology Program to provide assistance to small businesses within the environmental justice zone in North Charleston. SCDHEC Trident District Office has indicated a small amount of funds received that may allow the compliance assistance ideas to be

integrated within the Office during the 2003 calendar year. This is exciting news to the project participants as this effort has clearly indicated that a direct assistance program is an effective tool to address environmental violations with small businesses. While the Industrial Ecology Program will not be funded to travel to North Charleston to directly assist with future projects, it is the intent of the program to establish and maintain the small business assistance website developed under the measurement grant. This website will offer companies basic information on compliance, links to regulatory agencies and an opportunity to e-mail questions to the staff of IEP on regulatory issues. The businesses, through the site, will also be provided an opportunity to improve disposal and recycling techniques (see above). Where feasibly possible due to travel on related grants, onsite assistance would still be provided to small businesses in the environmental justice area following the end of the grant.

IV. Results:

*Describe results and attach additional information if necessary. Examples of results for **outcome measurement** might include progress on major milestones such as data on improvements from enforcement or compliance assurance activities, establishment of a baseline for compliance rate, development of a data system, completed methodology, survey design complete, or survey results obtained. Examples of results from **data quality** might include actual improvements in data quality or completeness, use of the data for program management. Examples of results from **public access** might include successfully making information available or statistics on the actual use of the information by the public (e.g., website hits).*

January 2002

GIS Mapping has been completed for the previous compliance assistance inspections. Mapping data has been placed on a zip drive and provided to the website development team. Information for the website has been drafted in word and also provided to the website team.

April 2002

As covered above, re-inspections have begun at the approximately 80 small businesses provided compliance assistance during the first phase of the Industrial Ecology Program funded under the Environmental Justice Through Pollution Prevention Grant. Six facilities have been inspected and all were found to have remained in compliance with state environmental regulations for the one year period during inspections. While 100% compliance is not likely to occur, the signs proving that compliance assistance can be successful are already emerging.

GIS mapping data and business inspection spreadsheets have been compiled for the new website development specialist. Meetings are scheduled during the second quarter to begin drafting the overall site. Copies of the drafts should be available during the second quarter or early in the third quarter for review by the Regional EPA projects manager and the SCDHEC staff involved in the onsite inspection process. Additional state environmental programs have been approached and agreed to participate on the website as links for communities and “experts” for questions. A protocol for referrals is being discussed at this time.

July 2002

Over half of the facilities inspected during the first phase of the project have now been re-inspected by SCDHEC. Approximately 90% of the facilities have remained in compliance with

state environmental regulations for one year after being provided an opportunity for regulatory assistance with a funded technical assistance referral program. Firms out of compliance primarily had problems with the storage of used motor oil being mislabeled, unsecured and/or uncovered. While these problems are still violations, the severity is much lower than the previous inspection where facilities were improperly disposing and flagrantly releasing wastes such as using storm drains for automotive fluids disposal. A follow-up is planned to determine if there are any significant reasons that the violations occurred such as new ownership (i.e. small business has not been educated as were previous owners) or if it was simply caused by lax business practices.

October 2002

Approximately 80% of the facilities inspected during the first phase of the project have now been re-inspected by SCDHEC. Unfortunately, it initially appeared that less than half of the additional 30% of the facilities re-inspected had remained in compliance. This would drop the success rate of the project to less than 85% and early indications from the forth quarter indicated a continuing trend of non-compliance. A careful review of the inspection sheets turned up the factors that caused this dramatic change. When the new inspector assumed responsibility for the compliance assistance reviews of the small businesses, violations of litter policy and general housekeeping were added to the letters indicating non-compliance. This statement should in no way indicate that the previous inspector ignored violations of the litter statutes. The previous inspector gave a verbal warning to the facilities that the “aesthetics” and would then refer the business to the SCDHEC litter officer for follow up. The owners/operators of the facility would be instructed that they would have to bring the shop area and surrounding grounds up to the state, county and city codes or they would be fined by the litter officer. The previous inspector kept the letter of non-compliance limited to direct environmental, health and safety violations. He felt follow up by the litter officer was more appropriate as the environmental office did not have enforcement options regarding litter until the site became a health hazard. A review of the 24 facilities inspected in September, of which 14 were found out of compliance, indicated that 10 of the 14 out-of-compliance letter regarded minor housekeeping issues. The remaining 4 facilities have issues with improper disposal of vehicle fluids that will need to be dealt with immediately. In each case, the new inspector felt signs indicated fluids were being disposed of down the city storm water sewer system. These violations will be followed up on by the inspector and by the City of North Charleston. Note, in addition to the storm water violation, one of the four small businesses could not produce the requested spill prevention control and countermeasures plan. This business has since been in contact with the Industrial Ecology program and the plan has been found. Additional assistance has been provided by the Industrial Ecology program to the 10 facilities found out-of-compliance, many of who were concerned to find their facilities in violation when they were felt to be operating correctly. Discussions will be going on during the forth quarter with SCDHEC personnel to determine if the differences in recording techniques should be factored out of the compliance rates.

January 2003

By January 2, 2003, 100% of the facilities identified in phase on of the Compliance Assistance project were re-inspected by the SCDHEC Trident District Office. While the exact numbers have not been prepared for distribution, a review indicates that over 90% of the facilities offered the chance to come into compliance through non-regulatory assistance as opposed to fines and

violations have remained in compliance for over one year. This clearly indicates that small businesses provided the information and opportunity will work towards true environmental compliance with state and federal regulations. During the month of January, data will be compiled by the SCDHEC compliance inspection field agent. This data will be made available through both a final project report and on the project website. The website will become the major communication device with the small business community to non-regulatory assistance following the completion of the project.

During the period from October to December, the eighteen final businesses inspected found only two out of compliance. The first was an auto repair facility identified in phase one that has since been purchased by new owners. The new owners had not dealt directly with the project but had kept essentially all environmental improvements in place. Two minor violations were found onsite. The first involved a used oil container not clearly labeled with the word "used oil" and the second involved one used oil container that had not been closed. The unclosed container had been left outside during a rain event the day prior to the inspection and was now full of an oil/water mixture. The owners were advised about tightly closing drums and covering oil storage areas. Additionally, the business was provided non-regulatory assistance in finding a company to assist in the disposal of used oil. The company had made the changes onsite within days of the first inspection and were therefore in compliance for the follow-up inspection approximately 45 days later. The SCDHEC inspector indicated that he anticipated this company would be a good environmental performer in the neighborhood. The second company found out of compliance was not inspected during the first phase of the project, as it is an auto salvage yard. This small salvage yard was found to be out of compliance on two small and one major regulatory issue. The two small involved an unlabeled used oil container and a non-cleaned up area of soil that had absorbed some oils. These violations were dealt with quickly. The major violation involved the incorrect storage and disposal of used antifreeze. The inspector identified an area of leaky radiators stored on the ground outside the garage area. The rain in the days prior to the inspection had caused the radiators to fill and overflow the antifreeze into the soil and irrigation system of the lot. The irrigation system has a direct connection to the storm drain outside the property. The owners of the site met with the SCDHEC inspector and were advised to the seriousness of the antifreeze violations. In the days following the inspection, a new procedure for both emptying old radiators prior to storage and covered storage were implemented. A follow-up inspection found all three violations had been addressed. Again, the inspector indicated the violations took place, in his opinion, due to lack of information as opposed to malicious intent. This once again backs up the original hypothesis of SCDHEC and the Industrial Ecology Program that businesses provided the correct information and an opportunity will voluntarily become good environmental stewards.

The final two months of the project will be spent compiling and reviewing data from compliance assistance inspections, technical assistance and community outreach. Data will be compiled both the SCDHEC Trident District Office Compliance Assistance inspector and the Industrial Ecology Program for inclusion in the final report to be delivered to EPA in March 2003.

V. Other

Reports should be sent to your EPA Regional Project Officer, and to Bob Tolpa at the email or

address below.

Robert D. Tolpa (2222A)
US EPA - Ariel Rios North Rm 6149A
1200 Pennsylvania Avenue NW
Washington, DC 20460
tolpa.robert@epa.gov
Tel: (202) 564-2337
Fax: (202) 564-0034